IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Serial No. 10/801,332
Filing Date .... March 15, 2004
Inventor.. Rudolph Balaz et al.
Group Art Unit 2131
Examiner .... Revak, Christopher A.
Attorney's Docket No. ....MS1-467USC2 (MS 147651.03)
Confirmation No. 1955
Title: VPN Enrollment Protocol Gateway

REPLY BRIEF

To: Commissioner for Patents
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        Pursuant to 37 C.F.R. §41.41, Appellant hereby submits a reply brief for

Application Serial No. 10/801,332 within the requisite time from the date of the

Examiner's Answer.

<div align="center">**Remarks**</div>

Appellant maintains the positions set forth in the Appeal Brief, and respectfully submits that pending claims 1-5 and 7-21 are allowable over the cited references.

Claims 1-5 and 7-20

With respect to claims 1-5 and 7-20, Appellant maintains the positions set forth in the Appeal Brief. Furthermore, in the Examiner's Answer at pp. 7-8, it was asserted that:

> Independent claims 1, 10, and 19 recite "receiving a request, from a requestor, for a password to be used by a device <u>when</u> communicating with the registration authority operating as a protocol gateway between the device and a certificate authority". The fact that the communications with the registration authority acting as a protocol gateway is conditional since "when" is claimed. The functionality of the registration authority acting as a protocol gateway is not required and is conditional, and thereby, the aspect of the registration authority is not important since it the claim language of the registration authority acting as a protocol gateway may not be required for use according to the claim language.

The claim language does include "when" because the device could possibly be performing other operations and need not always be communicating with the registration authority. However, the password is used by the device when the device is communicating with the registration authority. This registration authority is operating as a protocol gateway between the device and a certificate authority. The device uses the password when communicating with the registration authority, but this operation of the registration authority as a protocol gateway between the device and a certificate authority is not conditional.

Claim 1 is directed to a method implemented in a registration authority. Claim 10 is directed to one or more computer-readable media having stored thereon a plurality of instructions that implement a registration authority. Claim 19 is directed to a registration authority system. In each of these claims, the registration authority operates as a protocol gateway between the device and a certificate authority. Although the device may not be constantly communicating with the registration authority, this operation of the registration authority as a protocol gateway is not conditional.

Additionally, in the Examiner's Answer at p. 8, it was asserted that:

> ... the examiner is interpreting the connection using the registration authority and a gateway equivalent to the Appellant's claim language of a "registration authority acting as a protocol gateway" ...

From this assertion it appears that the registration authority and the gateway of Mikurak, as two separate components, are being viewed as equivalent to the single registration authority acting as a protocol gateway. Appellant respectfully submits that a separate registration authority and a separate gateway does not disclose a registration authority operating as a protocol gateway. There is no discussion or mention in Mikurak of combining these two separate components into a single registration authority. Without such discussion or mention, Appellant respectfully submits that Mikurak cannot disclose the registration authority as recited in claims 1, 10, and 19.

For at least these reasons, Appellant respectfully submits that claims 1, 10, and 19 are allowable over Colvin in view of Mikurak.

Given that claims 2-5 and 7-9 depend from claim 1, claims 11-18 depend from claim 10, and claim 20 depends from claim 19, Appellant respectfully

submits that claims 2-5, 7-9, 11-18, and 20 are likewise allowable over Colvin in view of Mikurak for at least the reasons discussed above.

Claim 21

With respect to claim 21, Appellant maintains the positions set forth in the Appeal Brief. Furthermore, in the Examiner's Answer at pp. 9-10, it was asserted that:

> In that the router comprises an IP address, which is known to be a unique value, the password is associated with the router and hence, is used to verify that the subsequent request actually came form the particular device, or router. The router provides an IP address and a password in order to prove that it belongs to the VPN and the verification of the password authorizes participation in the VPN of Andersson et al which meets the Appellant's claim limitations.

As discussed in the Appeal Brief, the password of Andersson is used to verify that a router can join a VPN. All routers that are part of a particular VPN would share the same password. Therefore, the password of Andersson could not verify that a request actually came from a particular router because multiple routers share that same password. Accordingly, Appellant respectfully submits that Andersson cannot disclose comparing the received password to the password in the password table to verify that the subsequent request actually came from the device as recited in claim 21.

For at least these reasons, Appellant respectfully submits that claim 21 is allowable over Colvin in view of Mikurak and further in view of Andersson.

Conclusion

The Office's basis and supporting rationale for the § 103(a) rejections is not supported by the teaching of the cited references. Appellant respectfully requests that the rejections be overturned and that pending claims 1-5 and 7-21 be allowed to issue.

Respectfully Submitted,

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